

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

v.

CONCORD MANAGEMENT AND  
CONSULTING LLC

Defendant.

CRIMINAL NUMBER:

1:18-cr-00032-2-DLF

**DEFENDANT CONCORD MANAGEMENT AND CONSULTING LLC’S REPLY TO  
THE GOVERNMENT’S RESPONSE REGARDING THE UNSEALING OF ORDERS,  
HEARING TRANSCRIPTS, AND PLEADINGS RELATED TO DEFENDANT  
CONCORD’S MOTION TO SHOW CAUSE**

Pursuant to the Court’s July 1, 2019 order, Defendant Concord Management and Consulting LLC (“Concord” or “Defendant”), through counsel, submits this Reply to the Government’s Response Regarding the Unsealing of Orders, Hearing Transcripts, and Pleadings Related to Concord’s Motion to Show Cause (“Response”).

Because the government has withdrawn its opposition to the unsealing of the proceedings relating to Concord’s Motion for Show Cause Order (ECF 129), Concord requests that all of the docket entries relating to its Motion be promptly unsealed because Special Counsel Mueller is expected to testify in public hearings before two House committees on July 17, 2019. The orders, filings, and hearing transcript relating to Concord’s Motion should be unsealed and available to the public prior to that testimony.

Additionally, for the sake of completeness, Concord requests that the May 23, 2019 Minute Order also be unsealed. The May 23, 2019 sealed Minute Order was not specifically mentioned in Concord’s Supplemental Briefing regarding its Motion for Show Cause Order (ECF 140), the Court’s Memorandum Opinion and Order, or the government’s Response. However, Concord’s

position is that the May 23, 2019 Minute Order should also be unsealed so that the public record regarding Concord's Motion for Show Cause Order is complete. Undersigned counsel has conferred with the government regarding the May 23, 2019 Minute Order; the government has no objection to the May 23, 2019 Minute Order being unsealed along with the other docket entries.

A proposed order is attached.

Dated: July 8, 2019

Respectfully submitted,

CONCORD MANAGEMENT AND  
CONSULTING LLC

By Counsel

/s/ Eric A. Dubelier

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 3, 2019, I have caused a copy of the foregoing Response to the Government's Opposition to Concord's Request to Unseal to be filed under seal with the Clerk's office via hand delivery and transmitted to the following counsel of record via email:

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